EXHIBIT C

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ATTACHMENT A

I
DEFINITIONS

A. "Monsanto" means the Monsanto Company, as identified in paragraph 12 of the Superseding Indictment.

B. "You" and "your" means Monsanto, and all persons or entities acting on its behalf or under its direction or control, including, without limitation, subsidiaries, affiliates, employees, partners, agents, representatives, independent contractors, accountants and attorneys.

C. "DBN" means Beijing Dabeinong Technology Group Company and all persons or entities acting on its behalf or under its direction or control, including, without limitation, its North America subsidiary DBN North America, Inc., and other subsidiaries, affiliates, employees, partners, agents, representatives, independent contractors, accountants and attorneys.

D. "BKN" means Beijing Kings Nower Seed Science & Technology Co. Ltd. and all persons or entities acting on its behalf or under its direction or control, including, without limitation, its North America subsidiary Kings Nower North America Company, Inc., and other subsidiaries, affiliates, employees, partners, agents, representatives, independent contractors, accountants and attorneys.

E. "Superseding Indictment" means the Superseding Indictment filed on July 2, 2014, against Mo Hailong (also known as Robert Mo), Mo Yun, and others, in the federal case *United States v. Li, et al.*, Case No. 13-cr-147, in the United States District Court for the Southern District of Iowa.

F. "Mo Hailong Criminal Complaint" means the Criminal Complaint filed on December 10, 2013 against Mo Hailong (also known as Robert Mo) in the federal case *United States v. Mo Hailong*, Case No. 13-mj-267, in the United States District Court for the Southern District of Iowa.

G. "Mo Yun Criminal Complaint" means the Criminal Complaint filed on July 1, 2014 against Mo Yun in the federal case *United States v. Mo Yun*, Case No. 14-mj-160, in the United States District Court for the Southern District of Iowa.

H. "Defendants" means the defendants charged in the Superseding Indictment, including Li Shaoming, Mo Hailong, Wang Lei, Wang Hongwei, Ye Jian, Lin Yong, and Mo Yun.

I. "Mo Matter" means the pre- and post-indictment investigation of certain allegations of trade secret theft (including corn germplasm and other corn-breeding-related information) by law enforcement authorities detailed in the Superseding Indictment, Mo Hailong Criminal Complaint and Mo Yun Criminal Complaint.

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J. "Government" means any and all agents or representatives of federal, state or local government departments, agencies or offices, including but not limited to the United States Department of Justice (including the Offices of the United States Attorney), the Federal Bureau of Investigation, the United States National Security Agency, the United States Central Intelligence Agency, the Department of Homeland Security (including Customs and Border Protection), the United States Department of Agriculture, and the Polk County (Iowa) Sheriff's Department.

K. "Field Corn" means every variety of maize in the United States that is not grown primarily for consumption as human food in the form of fresh kernels or not grown primarily as popcorn; *i.e.,* all varieties of maize besides sweet corn or popcorn.

L. "Communications" means the transmittal, exchange or disclosure of information (in the form of facts, inquiries or otherwise), as reflected, memorialized, notated or otherwise recorded in electronically-stored information or other documentary form.

M. "Documents" means materials producible under the Federal Rules, including materials that are written, printed, recorded, or produced and/or maintained electronically.

N. "Person" is defined as any natural person or any business or organization, including any legal, governmental, for profit and not-for-profit entity or association.

O. The term "concerning" means regarding, relating to, referring to, describing, depicting, evidencing or constituting.

II
INSTRUCTIONS

A. Produce all responsive documents in your possession, custody or control, and as they are kept in the ordinary course of business.

B. If you are unable to produce in full any responsive document, (i) produce each such document to the fullest extent possible; (ii) specify the reasons for your inability to produce the remainder; and (iii) state in detail all of your information and belief about the location and substance of the document.

C. If any responsive document was at one time, but is no longer, in your possession, custody or control, (i) identify each such document; (ii) specify why the document is no longer in your possession, custody or control; and (iii) state in detail all of your information and belief about the location and substance of the document.

D. If any responsive document (or a portion thereof) is withheld on the basis of privilege, identify the following for each such document: (i) date; (ii) author; (iii) addressees; (iv) other recipients; (v) relationship of the author, addressees and recipients to each other, if not readily apparent; (vi) document type (e.g., letter or memorandum); (vii) general subject matter; and (viii) nature of the claimed privilege.

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E. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

F. The use of the singular form of any word includes the plural and vice versa.

III
ITEMS REQUESTED

1. Visitor requests, entry logs, agendas, tour itineraries, security passes and correspondence concerning the following visits (as alleged) by the Defendants to Monsanto's facilities in Missouri and Iowa:

    a. Mo Hailong's visit to Monsanto's facilities in or about September 2007;

    b. Mo Hailong's visit to Monsanto's facilities in or about October 2010;

    c. Mo Hailong and Wang Lei's visit to Monsanto's facilities in or about April or May 2011;

    d. Mo Hailong, Li Shaoming and Wang Lei's visit to Monsanto's facilities in or about September 2011, including a visit on or about September 19, 2011; and

    e. Mo Hailong and Wang Lei's visit to Monsanto's facilities in Ankeny, Iowa on or about February 15, 2012.

2. Requests for assistance in obtaining visitor visas for trips to the United States that Monsanto received from Li Shaoming in 2007 and Li Shaoming and Wang Lei in 2011, and letters in support and drafts thereof concerning visitor visas for trips to the United States that Monsanto provided to Li Shaoming in 2007 and Li Shaoming and Wang Lei in 2011.

3. Communications and documents concerning potential cooperation, business engagements or information exchanges between Monsanto and DBN or BKN during the following time periods and/or in connection with the following events:

    a. discussions in or about December 2006 during the American Seed Trade Association Seed Expo in Chicago, IL;

    b. discussions at the Gordon International Agriculture Conference in Ventura, California in or about March 2007;

    c. discussions in or about September 2007 during and following a visit by Mo Hailong to Monsanto's headquarters in St. Louis, MO;

    d. discussions in or about June 2008; and

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e. discussions in or about October 2010 during and following a visit by Mo Hailong to Monsanto's headquarters in St. Louis, MO.

4. Documents as specified below concerning the field in or around , as referred to in paragraph 36 of the Superseding Indictment (the " "):

   a. documents sufficient to identify the varieties of Monsanto field corn grown on the in or about September 2011;

   b. photographs of the particular location on the where the events articulated in paragraph 36 of the Superseding Indictment took place in or about September 2011; and

   c. grower agreements, leases, contracts or agreements between you and the owner of the any person retained by you to grow field corn on the , or any person retained by you to monitor the , in or about September 2011, including Vercel E. Barnes and Maties Mimo.

5. Documents as specified below concerning the field in or around , as referred to in paragraph 49 of the Superseding Indictment (the " "):

   a. documents sufficient to identify the varieties of Monsanto field corn grown on the in or about August 2012;

   b. photographs of the particular location on the where the events articulated in paragraph 49 of the Superseding Indictment took place in or about August 2012; and

   c. grower agreements, leases, contracts or agreements between you and the owner of the , any person retained by you to grow field corn on the , or any person retained by you to monitor the , in or about August 2012.

6. Documents as specified below concerning the fields in or around , as referred to in paragraph 50 of the Superseding Indictment (the " "):

   a. documents sufficient to identify the varieties of Monsanto field corn grown on the in or about August 2012;

   b. photographs of the particular location on the where the events articulated in paragraph 50 of the Superseding Indictment took place in or about August 2012; and

   c. grower agreements, leases, contracts or agreements between you and the owner of the any person retained by you to grow field corn on the , or any person retained by you to monitor the , in or about August 2012.

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7. Documents as specified below concerning the fields in or around [redacted], as referred to in paragraph 61 of the Superseding Indictment (the "[redacted]"):

    a. documents sufficient to identify the varieties of Monsanto field corn grown on the [redacted] in or about September 2012;

    b. photographs of the particular location on the [redacted] where the events articulated in paragraph 61 of the Superseding Indictment took place in or about September 2012; and

    c. grower agreements, leases, contracts or agreements between you and the owner of the [redacted], any person retained by you to grow field corn on the [redacted], or any person retained by you to monitor the [redacted], in or about September 2012.

8. Documents as specified below concerning the fields in or around [redacted] as referred to in paragraph 62 of the Superseding Indictment (the "[redacted]"):

    a. documents sufficient to identify the varieties of Monsanto field corn grown on the [redacted] in or about September 2012;

    b. photographs of the particular location on the [redacted] where the events articulated in paragraph 62 of the Superseding Indictment took place in or about September 2012; and

    c. grower agreements, leases, contracts or agreements between you and the owner of the [redacted], any person retained by you to grow field corn on the [redacted] any person retained by you to monitor the [redacted], in or about September 2012.

9. Documents as specified below concerning the field in or around [redacted] as referred to in paragraph 63 of the Superseding Indictment (the "[redacted]):

    a. documents sufficient to identify the varieties of Monsanto field corn grown on the [redacted] in or about September 2012;

    b. photographs of the particular location on the [redacted] where the events articulated in paragraph 63 of the Superseding Indictment took place in or about September 2012; and

    c. grower agreements, leases, contracts or agreements between you and the owner of the [redacted], any person retained by you to grow field corn on the [redacted], or any person retained by you to monitor the [redacted], in or about September 2012.

10. Documents as specified below concerning the field in or around [redacted], as referred to in paragraph 64 of the Superseding Indictment (the "[redacted]"):

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a. documents sufficient to identify the varieties of Monsanto field corn grown on the in or about September 2012;

b. photographs of the particular location on the where the events articulated in paragraph 64 of the Superseding Indictment took place in or about September 2012; and

c. grower agreements, leases, contracts or agreements between you and the owner of the any person retained by you to grow field corn on the or any person retained by you to monitor the in or about September 2012.

11. For the period from January 1, 2010 through December 31, 2012, all contracts and agreements with Aaron Mason and MFA Agri Services of Pattonsburg, Missouri (including its employees, agents and representatives), concerning sales of Monsanto field corn seed.

12. For the period from January 1, 2010 through December 31, 2012, all contracts and agreements with Whitney Mason and MFA Agri Services of Bethany, Missouri (including its employees, agents and representatives), concerning sales of Monsanto field corn seed.

13. Executed grower agreements, technology agreements, use restriction agreements or other agreements as described in paragraphs 22(d) and 23(h) of the Superseding Indictment with regard to the following locations:

a. MFA Agri Services in Pattonsburg, Missouri from January 1, 2010 through December 31, 2012; and

b. MFA Agri Services in Bethany, Missouri from January 1, 2010 through December 31, 2012.

14. Documents sufficient to identify when Monsanto first began requiring purchasers of field corn seeds at MFA Agri Services in Pattonsburg, Missouri and MFA Agri Services in Bethany, Missouri to sign grower agreements, technology agreements, use restriction agreements or other agreements such as described in paragraphs 22(d) and 23(h) of the Superseding Indictment.

15. Documents sufficient to identify (i) Plant Variety Protection Act applications and (ii) patent application numbers applicable for each of the following varieties of Monsanto field corn: Monsanto Product ID numbers

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16. Visitor requests, entry logs, agendas, tour itineraries, security passes and correspondence concerning the visit (as alleged) by Wu Hougang to Monsanto's facility in Ankeny, Iowa on or about February 15, 2012.

17. Test results, whether conclusive or not, concerning the testing of field corn seeds provided by the Government to you or provided by you to the Government in connection with the Mo Matter.

18. Testing protocols utilized in connection with the tests described in Request 17.